

BURNS BAIR LLP

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*Special Insurance Counsel to the Official Committee
of Unsecured Creditors of The Roman Catholic Diocese
of Rockville Centre, New York*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

THE ROMAN CATHOLIC DIOCESE OF
ROCKVILLE CENTRE, NEW YORK,
Debtor.

Chapter 11

Case No. 20-12345 (MG)

**THIRTY-FIRST MONTHLY FEE STATEMENT OF BURNS BAIR LLP,
AS SPECIAL INSURANCE COUNSEL TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR PROFESSIONAL SERVICES RENDERED
AND DISBURSEMENTS INCURRED FOR THE PERIOD FROM
MAY 1, 2023 THROUGH MAY 31, 2023**

Name of Applicant:	<u>Burns Bair LLP</u>
Authorized to Provide Professional Services to:	<u>Official Committee of Unsecured Creditors</u>
Date of Retention:	Effective October 29, 2020 pursuant to Order dated December 9, 2020 [Docket No. 246]
Period for which compensation and reimbursement is sought:	<u>May 1, 2023 – May 31, 2023</u>
Amount of Compensation sought as actual, reasonable, and necessary:	\$151,579.75 <u>80% of which is \$121,263.80</u>
Amount of Expense Reimbursement sought as actual, reasonable, and necessary:	<u>\$7,084.73</u>
TOTAL (80% of fees and 100% of costs)	<u>\$128,348.53</u>

This is the thirty-first monthly fee statement.

PRELIMINARY STATEMENT

Burns Bair LLP (“Burns Bair”), as Special Insurance Counsel to the Official Committee of Unsecured Creditors (the “Committee”) of The Roman Catholic Diocese of Rockville Centre, New York (the “Debtor”), hereby submits this thirty-first monthly statement (the “Monthly Statement”) for the period from May 1, 2023 through May 31, 2023 (the “Statement Period”) for payment of professional services rendered and reimbursement of expenses incurred during the Statement Period pursuant to the Court’s *Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* dated November 4, 2020 [Docket No. 129] (the “Interim Compensation Order”). Burns Bair requests: (a) interim allowance and payment of compensation in the amount of \$121,263.80 (80% of \$151,579.75) for fees on account of reasonable and necessary professional services rendered to the Committee by Burns Bair, and (b) reimbursement of actual and necessary costs and expenses in the amount of \$7,084.73.

FEES FOR SERVICES RENDERED DURING THE STATEMENT PERIOD

1. Set forth below is a list of the positions of the Burns Bair professionals and paraprofessionals who provided services to the Committee during the Statement Period, their respective billing rates, and the aggregate hours spent by each professional and paraprofessional in providing services on behalf of the Committee during the Statement Period.

Name	Title	Year of Partnership	Year of Admission	Hourly Rate	Total Hours Billed	Total Compensation
Timothy Burns	Partner	2008	1991	\$975	57.00	\$55,575.00
Timothy Burns - Travel	Partner	2008	1991	\$487.50	26.00	\$12,675.00
Jesse Bair	Partner	2020	2013	\$625	79.60	\$49,750.00
Jesse Bair - Travel	Partner	2020	2013	\$312.50	19.50	\$6,093.75
Nathan Kuenzi	Associate	N/A	2020	\$420	17.30	\$7,266.00
Brian Cawley	Associate	N/A	2020	\$420	17.20	\$7,224.00
Leakhena Au	Associate	N/A	2020	\$420	29.40	\$12,348.00
Alyssa Turgeon	Paralegal	N/A	N/A	\$360.00	.90	\$324.00
Karen Dempski	Paralegal	N/A	N/A	\$360.00	.10	\$36.00
Brenda Horn-Edwards	Paralegal	N/A	N/A	\$360.00	.80	\$288.00
TOTAL:					247.80	\$151,579.75

2. The rates charged by Burns Bair for services rendered to the Committee are the same rates that it charges generally for professional services rendered to its non-bankruptcy clients. A complete itemization of tasks performed by these professionals and paraprofessionals for the Statement Period is annexed hereto as **Exhibit A**.

NOTICE AND OBJECTION PROCEDURES

3. No trustee or examiner has been appointed in these chapter 11 cases. Pursuant to the Interim Compensation Order, Burns Bair has provided notice of this statement upon the following parties by electronic or first class mail: (a) the Debtor c/o The Roman Catholic Diocese of Rockville Centre, 50 N Park Ave P.O. Box 9023, Rockville Centre, NY 11571-9023 (Attn: Thomas Renker); (b) the attorneys for the Debtor, Jones Day, 250 Vesey Street, New York, NY 10281 (Attn: Corinne Ball, Esq., Benjamin Rosenblum, Esq. and Andrew M. Butler, Esq.); and (c) the Office of the United States Trustee Region 2 (the “U.S. Trustee”), 201 Varick Street, Suite 1006, New York, NY 10014 (Attn: Greg Zipes, Esq. and Shara Cornell, Esq.). Burns Bair submits that no other or further notice need be provided.

4. Pursuant to the Interim Compensation Order, objections to this Monthly Statement, if any, must be served upon the Application Recipients by **July 17, 2023** (the “**Objection Deadline**”) setting forth the nature of the objection and the amount of fees or expenses at issue.

5. If no objections to this Monthly Statement are made on or before the Objection Deadline, the Debtor shall pay Burns Bair 80% of the fees and 100% of the expenses set forth above. To the extent an objection to this Monthly Statement is timely made, the Debtor shall withhold payment of that portion of the Monthly Statement to which the objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth above. To the extent such objection is not resolved; it shall be preserved and presented to the Court at the next interim or final fee application hearing.

Dated: June 30, 2023

BURNS BAIR LLP

/s/ Timothy W. Burns

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*Special Insurance Counsel to the Official
Committee of Unsecured Creditors of The Roman
Catholic Diocese of Rockville Centre, New York*

EXHIBIT A

Burns | Bair

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608-286-2302
www.BurnsBair.com

**The Official Committee of Unsecured Creditors
of The Roman Catholic Diocese of Rockville
Centre**

Issue Date : 6/1/2023

Bill # : 01146

Due Date : Upon Receipt

Matter: Insurance

PROFESSIONAL SERVICES RENDERED

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
5/1/2023	Leakhena Au	Participate in BB team conference re case developments and projects (.2);	0.20	\$84.00
5/1/2023	Jesse Bair	Participate in BB team conference re case developments and projects (.2);	0.20	\$125.00
5/1/2023	Timothy Burns	Conference with J. Bair re mediation strategy (.1); conference with BB team re insurance strategy and related assignments (.2); review and respond to B. Michael correspondence re Committee mediation brief (.1); further review of Committee mediation statement (.2); review correspondence from J. Bair re Arrowood exposure (.1);	0.70	\$682.50
5/1/2023	Jesse Bair	Review correspondence with B. Michael and I. Nasatir re Arrowood issues in connection with the Committee's mediation statement (.1); review T. Burns correspondence re same (.1);	0.20	\$125.00
5/1/2023	Brian Cawley	Participate in BB team conference re insurance strategy and related assignments (.2)	0.20	\$84.00
5/1/2023	Jesse Bair	Review revised version of the Committee's mediation statement (.1);	0.10	\$62.50
5/1/2023	Alyssa Turgeon	Participate in BB team conference re insurance strategy and related assignments (.2)	0.20	\$72.00
5/1/2023	Jesse Bair	Review the Court's Order granting in part and over-ruling in part the Diocese's 8th omnibus claims objection (.6);	0.60	\$375.00
5/1/2023	Alyssa Turgeon	Draft mediation preparation binder for T. Burns (0.5);	0.50	\$180.00
5/1/2023	Jesse Bair	Participate in conference with T. Burns re insurance mediation strategy (.1);	0.10	\$62.50

5/1/2023	Jesse Bair	Review K. Dine and B. Michael correspondence to the Committee re case developments and mediation (.1);	0.10	\$62.50
5/1/2023	Jesse Bair	Review the Diocese's requests for admission to Arrowood re policy terms and language (.2);	0.20	\$125.00
5/1/2023	Nathan Kuenzi	Participate in BB team conference re case developments and projects (.2);	0.20	\$84.00
5/2/2023	Jesse Bair	Attend May 2 hearing re CFN sale for insurance purposes (.3);	0.30	\$187.50
5/2/2023	Jesse Bair	Review and edit revised version of the Committee's draft mediation statement, incorporating new Claro figures (.4); review and respond to correspondence with B. Michael re same and related insurance issues (.2);	0.60	\$375.00
5/2/2023	Timothy Burns	Review and revise updated version of the Committee's mediation statement (.7); review correspondence with J. Bair and B. Michael re same (.2);	0.90	\$877.50
5/2/2023	Jesse Bair	Analyze Claro's revised valuation and insurance allocation analysis (.2);	0.20	\$125.00
5/3/2023	Jesse Bair	Review correspondence with B. Michael and the Committee re recent CVA jury verdict (.1);	0.10	\$62.50
5/3/2023	Jesse Bair	Correspondence with B. Michael and I. Nasatir re LMI SIR issues (.1);	0.10	\$62.50
5/3/2023	Jesse Bair	Review the Diocese's mediation statement (.4);	0.40	\$250.00
5/3/2023	Jesse Bair	Participate in call with B. Michael and I. Nasatir re BSA impact, if any, on DRVC claims (.3);	0.30	\$187.50
5/3/2023	Jesse Bair	Review the parishes' mediation statement (.3);	0.30	\$187.50
5/4/2023	Jesse Bair	Review and respond to correspondence with PSZJ team and the mediators regarding potential exchange of redacted Committee mediation statement with the carriers (.2); conference with T. Burns re same and overall insurance strategy for upcoming mediation sessions (.2);	0.40	\$250.00
5/4/2023	Jesse Bair	Review follow-up correspondence from the mediators re exchange of meditation information and related issues (.1);	0.10	\$62.50
5/4/2023	Jesse Bair	Participate in portion of meeting with PSZJ team re mediation strategy for insurance purposes (.7); participate in follow-up conference with T. Burns re outcome of same and agenda for upcoming mediation session (.1);	0.80	\$500.00
5/4/2023	Jesse Bair	Participate in call with Claro re insurance allocation issues (.2);	0.20	\$125.00
5/4/2023	Nathan Kuenzi	Begin researching Delaware law re unfair claims handling practices in connection with Arrowood strategy (.7);	0.70	\$294.00

5/4/2023	Jesse Bair	Review draft Claro mediation presentation (.3);	0.30	\$187.50
5/4/2023	Timothy Burns	Participate in call with state court counsel re insurance mediation strategy (.1); participate in call with J. Stang re same (.6);	0.70	\$682.50
5/4/2023	Jesse Bair	Participate in conference with B. Cawley re instructions for preparing Committee insurance presentation for upcoming mediation session (.4); draft follow-up correspondence to B. Cawley providing supplemental instructions and attaching various case materials needed to prepare presentation (.3);	0.70	\$437.50
5/4/2023	Brian Cawley	Participate in conference with J. Bair re instructions for preparing Committee insurance presentation for upcoming mediation session (.4); analyze documents sent by J. Bair in connection with preparing insurance presentation (.9); begin drafting Committee insurance mediation presentation (.2);	1.50	\$630.00
5/5/2023	Nathan Kuenzi	Draft outline of memorandum for T. Burns re unfair claims handling practices in connection with Arrowood strategy (.5);	0.50	\$210.00
5/5/2023	Jesse Bair	Participate in supplemental call with T. Burns re outcome of state court counsel meeting and preparations in advance of upcoming mediation session (.1);	0.10	\$62.50
5/5/2023	Timothy Burns	Participate in conference with J. Bair re the Committee's mediation statement and upcoming mediation session (.2); participate in additional conference with J. Bair re insurance strategy for upcoming mediation session (.1);	0.30	\$292.50
5/5/2023	Brian Cawley	Continue drafting Committee insurance mediation presentation (2.2); participate in conference with J. Bair re same and potential edits (.2); correspondence with J. Bar re same (.1);	2.50	\$1,050.00
5/5/2023	Jesse Bair	Conference with B. Cawley and answer questions re preparation of Committee insurance presentation for upcoming mediation session (.2);	0.20	\$125.00
5/5/2023	Brian Cawley	Continue drafting Committee insurance mediation presentation (4.0);	4.00	\$1,680.00
5/5/2023	Jesse Bair	Participate in call with T. Burns re Arrowood and mediation strategy (.1)	0.10	\$62.50
5/5/2023	Nathan Kuenzi	Continue detailed research re Delaware common law, statutes, and regulations re unfair claims handling practices in connection with Arrowood strategy (5.5);	5.50	\$2,310.00

5/5/2023	Jesse Bair	Participate in state court counsel meeting for insurance purposes re mediation preparations and strategy for upcoming sessions (1.2);	1.20	\$750.00
5/5/2023	Jesse Bair	Review Reed Smith supplemental submission re insurance expert work (.1);	0.10	\$62.50
5/5/2023	Jesse Bair	Correspondence with I. Nasatir re Committee insurance mediation presentation (.1);	0.10	\$62.50
5/6/2023	Jesse Bair	Review Claro analysis re revised insurance "buckets" for POCs (.1); correspondence with Claro re same and additional analysis needed (.1);	0.20	\$125.00
5/6/2023	Jesse Bair	Begin reviewing and editing initial draft of the Committee's insurance mediation presentation, including drafting additional sections of same (1.9);	1.90	\$1,187.50
5/7/2023	Jesse Bair	Analyze and incorporate T. Burns' suggested edits into draft Committee insurance mediation presentation (.2); correspondence with I. Nasatir re same (.1);	0.30	\$187.50
5/7/2023	Nathan Kuenzi	Continue detailed research re Delaware common law, statutes, and regulations re unfair claims handling practices in connection with Arrowood strategy (1.5);	1.50	\$630.00
5/7/2023	Jesse Bair	Review J. Stang correspondence re draft Committee insurance mediation presentation (.1);	0.10	\$62.50
5/7/2023	Jesse Bair	Continue reviewing and editing initial draft of the Committee's insurance mediation presentation, including drafting additional sections of same (1.3);	1.30	\$812.50
5/8/2023	Alyssa Turgeon	Participate in BB team conference re case strategy and related assignments (.1);	0.10	\$36.00
5/8/2023	Jesse Bair	Participate in conference with T. Burns re outcome of call with the mediator (.2);	0.20	\$125.00
5/8/2023	Timothy Burns	Participate in call with the mediator re insurance issues and upcoming mediation sessions (1.0); participate in follow-up meeting with J. Bair re same and outcome of mediator call (.2); participate in BB team conference re case strategy and related assignments (.1); review the Diocese's motion to quash certain Arrowood subpoenas (.1);	1.40	\$1,365.00
5/8/2023	Nathan Kuenzi	Participate in BB team conference re case strategy and related assignments (.1);	0.10	\$42.00
5/8/2023	Leakhena Au	Participate in BB team meeting re case developments and related assignment (.1);	0.10	\$42.00
5/8/2023	Jesse Bair	Correspond with T. Burns re key insurance materials for review in advance of upcoming mediation session (.1);	0.10	\$62.50
5/8/2023	Jesse Bair	Review the Diocese's motion to quash certain Arrowood subpoenas (.1);	0.10	\$62.50

5/8/2023	Jesse Bair	Participate in BB team meeting re case developments and related assignment (.1);	0.10	\$62.50
5/8/2023	Jesse Bair	Review monthly PSIP information provided by the Diocese (.1);	0.10	\$62.50
5/8/2023	Nathan Kuenzi	Finish research re Delaware unfair claims handling practices in connection with Arrowood strategy (1.9); draft email memorandum for T. Burns summarizing research re same (2.3);	4.20	\$1,764.00
5/8/2023	Jesse Bair	Participate in conference and provide instructions to B. Cawley re preparing supplemental insurance presentations for potential use during upcoming mediation sessions (.4);	0.40	\$250.00
5/8/2023	Brian Cawley	Participate in conference with J. Bair re preparing supplemental insurance presentations for potential use during upcoming mediation sessions (.4);	0.40	\$168.00
5/8/2023	Brian Cawley	Participate in BB team conference re case strategy and related assignments (.1);	0.10	\$42.00
5/9/2023	Nathan Kuenzi	Draft supplemental email memorandum for T. Burns addressing additional unfair claims practices issues under Delaware law in connection with Arrowood strategy (1.2);	1.20	\$504.00
5/9/2023	Timothy Burns	Travel from Madison to New York for mediation [billed at 1/2 travel rate] (5.8);	5.80	\$2,827.50
5/9/2023	Brian Cawley	Draft additional Committee insurance mediation presentation focusing on unfair claims handling and deceptive practices issues (2.0); draft additional Committee insurance mediation presentation with particular focus on certain LMI/Interstate issues (1.4); correspondence with J. Bair re insurance presentations (.1);	3.50	\$1,470.00
5/9/2023	Timothy Burns	Participate in call with J. Bair re Arrowood litigation strategy (.2); prepare for call with state court counsel re Arrowood issues and strategy (.8); participate in call with state court counsel group re same (.8); prepare for upcoming mediation session, including review of the parties' mediation statements, draft presentations, and other case insurance materials (3.1); participate in conference with J. Bair re mediation strategy (.5);	5.40	\$5,265.00
5/9/2023	Jesse Bair	Participate in conference with T. Burns re mediation preparations and strategy (.5);	0.50	\$312.50

5/9/2023	Jesse Bair	Review and edit initial draft of PSZJ mediation presentation (.3); review correspondence with G. Greenwood and I. Nasatir re potential edits to same (.2); review I. Nasatir's suggested changes to same (.2); draft additional insurance sections of same (.2); continue analyzing insurance materials in preparation for tomorrow's mediation session (.1);	1.00	\$625.00
5/9/2023	Jesse Bair	Participate in call with T. Burns re Arrowood litigation strategy (.2);	0.20	\$125.00
5/9/2023	Jesse Bair	Travel from Madison to New York for mediation [billed at 1/2 travel rate] (7.2);	7.20	\$2,250.00
5/9/2023	Nathan Kuenzi	Research issues regarding insurance commissioner oversight and regulatory actions re insolvent insurance companies in connection with Arrowood strategy (3.3);	3.30	\$1,386.00
5/9/2023	Jesse Bair	Draft supplemental presentation for potential use at upcoming mediation re alternative insurance settlement strategies (.9);	0.90	\$562.50
5/9/2023	Jesse Bair	Review insurance portion of prior Committee mediation statement recently sent to Judge Cave (.1);	0.10	\$62.50
5/10/2023	Jesse Bair	Participate in post-mediation session meeting with PSZJ, T. Burns, and state court counsel re outcome of session and next-steps re case mediation (.5);	0.50	\$312.50
5/10/2023	Timothy Burns	Return travel to Madison from New York mediation [billed at 1/2 travel rate] (5.4);	5.40	\$2,632.50
5/10/2023	Timothy Burns	Participate in pre-mediation meeting with PSZJ and J. Bair re strategy for upcoming session and related presentations (1.5); participate in Committee-only mediation session (5.1); participate in post-mediation session meeting with PSZJ and state court counsel re outcome of session and next-steps (.5);	7.10	\$6,922.50
5/10/2023	Jesse Bair	Return travel to Madison from New York mediation [billed at 1/2 travel rate] (4.6);	4.60	\$1,437.50
5/10/2023	Jesse Bair	Analyze coverage materials in preparation for mediation session (.3);	0.30	\$187.50
5/10/2023	Jesse Bair	Participate in portion of Committee meeting for insurance purposes re outcome of mediation session and next-steps (1.1);	1.10	\$687.50
5/10/2023	Jesse Bair	Review Claro revised mediation presentation (.2);	0.20	\$125.00
5/10/2023	Jesse Bair	Participate in pre-mediation meeting with PSZJ and T. Burns re strategy for upcoming session and related presentations (1.5);	1.50	\$937.50
5/10/2023	Jesse Bair	Participate in Committee-only mediation session with Judge Cave and Paul van Osselaer (5.1);	5.10	\$3,187.50

5/10/2023	Jesse Bair	Review B. Cawley drafts of mediation presentations re potential alternative settlements strategies (.2);	0.20	\$125.00
5/10/2023	Brenda Horn-Edwards	Draft monthly BB fee statement (.6); generate and edit Exhibit A to same (.1); correspond with J. Bair re same (.1);	0.80	\$288.00
5/11/2023	Jesse Bair	Review Committee agenda for upcoming team strategy call (.1);	0.10	\$62.50
5/11/2023	Jesse Bair	Brief review re Arrowood's 30(b)(6) notice on the Diocese (.1);	0.10	\$62.50
5/11/2023	Jesse Bair	Review Arrowood's motion to compel letter to the Court re Diocesan deposition testimony (.2);	0.20	\$125.00
5/11/2023	Jesse Bair	Prepare for call with T. Law re Arrowood discovery issues (.1); participate in call with T. Law re same (.2);	0.30	\$187.50
5/11/2023	Jesse Bair	Review correspondence with B. Michael, J. Stang, and the Committee re additional Thursday mediation session (.1);	0.10	\$62.50
5/11/2023	Jesse Bair	Participate in call with T. Burns re outcome of strategy call with PSZJ and insurance strategy for upcoming mediation session (.3);	0.30	\$187.50
5/11/2023	Jesse Bair	Participate in conference with B. Cawley re mediation session outcome and next-steps (.2);	0.20	\$125.00
5/11/2023	Timothy Burns	Participate in weekly team strategy call with PSZJ for insurance purposes re ongoing case tasks and strategy (1.4); participate in call with I. Nasatir re notice testimony (.2); participate in call with J. Bair re insurance strategy for upcoming mediation session (.3); additional analysis re same (.4); participate in call with state court counsel re same (.2);	2.50	\$2,437.50
5/11/2023	Jesse Bair	Participate in call with B. Michael re Arrowood discovery and case insurance issues (.3);	0.30	\$187.50
5/12/2023	Timothy Burns	Participate in conference with J. Bair re insurance mediation strategy (.2); review correspondence from B. Michael re upcoming mediation session (.1); review correspondence from B. Michael re agenda for upcoming state court counsel meeting (.1); review Arrowood's letter re motion to compel deposition testimony (.1); review Arrowood's response to the Diocese's motion to quash (.2); review the Diocese's response to Arrowood's letter to the court re deposition motion to compel (.2); participate in call with J. Bair re outcome of state court counsel meeting and related insurance issues (.2);	1.10	\$1,072.50
5/12/2023	Jesse Bair	Review Arrowood's response to the Diocese's motion to quash certain subpoenas (.2);	0.20	\$125.00

5/12/2023	Jesse Bair	Review correspondence from the mediators re supplemental May 18 mediation session (.1);	0.10	\$62.50
5/12/2023	Jesse Bair	Review prior Committee intervention briefing in the Arrowood insurance adversary proceeding (.2); participate in conference with L. Au re supplemental research needed re same in connection with potential expanded Committee discovery rights in Arrowood district court action (.2);	0.40	\$250.00
5/12/2023	Jesse Bair	Participate in conference with T. Burns re insurance mediation strategy (.2);	0.20	\$125.00
5/12/2023	Jesse Bair	Brief review of case law re the scope of a Committee's intervention rights under Section 1109(b) (.2); review the district court's prior order granting in part and denying in part Arrowood's earlier motion to compel (.1); draft correspondence to the Diocese re Committee attendance at all future depositions in the Arrowood district court action (.4);	0.70	\$437.50
5/12/2023	Jesse Bair	Participate in conference with PSZJ team re Plan issues and related strategy (.8);	0.80	\$500.00
5/12/2023	Jesse Bair	Participate in state court counsel meeting for insurance purposes re mediation and litigation strategy (.7); participate in follow-up call with T. Burns re outcome of same and next-steps (.2);	0.90	\$562.50
5/12/2023	Leakhena Au	Detailed research re Second Circuit case law re the parameters of a Committee's discovery and other litigation rights as a party in interest under Section 1109(b) in connection with Arrowood adversary proceeding (6.8);	6.80	\$2,856.00
5/12/2023	Jesse Bair	Review the Diocese's response to Arrowood's motion to compel deposition testimony (.2);	0.20	\$125.00
5/13/2023	Jesse Bair	Review T. Burns correspondence re writ of mandamus filed by the Diocese of Brooklyn seeking to compel the Delaware Insurance Commissioner to put Arrowood into liquidation (.1);	0.10	\$62.50
5/15/2023	Jesse Bair	Review the Diocese of Brooklyn's writ of mandamus seeking to compel the Delaware Insurance Commissioner to put Arrowood into liquidation (.4);	0.40	\$250.00
5/15/2023	Jesse Bair	Review and respond to correspondence with B. Michael and I. Nasatir re the Diocese of Brooklyn's Arrowood writ and Committee attendance at future Arrowood depositions (.2);	0.20	\$125.00
5/15/2023	Jesse Bair	Participate in conference with T. Burns re case insurance strategy (.3);	0.30	\$187.50
5/15/2023	Alyssa Turgeon	Participate in BB team conference re insurance strategy and related assignments (.1);	0.10	\$36.00

5/15/2023	Nathan Kuenzi	Participate in BB team conference re insurance strategy and case assignments (.1);	0.10	\$42.00
5/15/2023	Jesse Bair	Review Judge Rochon's order in the Arrowood district court action re hearing on the parties' current discovery disputes (.1);	0.10	\$62.50
5/15/2023	Jesse Bair	Review and respond to correspondence with Reed Smith re Committee attendance at future depositions in the Arrowood district court action (.2);	0.20	\$125.00
5/15/2023	Leakhena Au	Participate in BB team conference re insurance strategy and related assignments (.1);	0.10	\$42.00
5/15/2023	Jesse Bair	Correspondence with B. Cawley re Diocese of Brooklyn expert affidavit filed in connection with Arrowood writ (.1);	0.10	\$62.50
5/15/2023	Brian Cawley	Participate in BB team conference re insurance strategy and related assignments (.1);	0.10	\$42.00
5/15/2023	Leakhena Au	Continue detailed research re Second Circuit case law re the parameters of a Committee's discovery and other litigation rights as a party in interest under Section 1109(b) in connection with Arrowood adversary proceeding (3.6); draft email memorandum summarizing research results (1.8);	5.40	\$2,268.00
5/15/2023	Jesse Bair	Participate in portion of Committee meeting for insurance purposes re case mediation and litigation strategy (.7);	0.70	\$437.50
5/15/2023	Timothy Burns	Participate in conference with J. Bair re case insurance strategy (.3); participate in call with state court counsel re insurance strategy (.1); participate in BB team meeting re case strategy and related assignments (.1); participate in call with state court counsel and J. Bair re Arrowood issue (.3); review research results re scope of the Committee's intervention rights (.2); review agenda for upcoming Committee meeting (.1); participate in Committee meeting for insurance purposes re case mediation and litigation strategy (1.0); participate in post-call with I. Nasatir re Arrowood issues (.2);	2.30	\$2,242.50
5/15/2023	Jesse Bair	Participate in conference with T. Burns and state court counsel re Arrowood strategy (.3);	0.30	\$187.50
5/16/2023	Brian Cawley	Research regarding writ of mandamus exhibits submitted in Delaware action requesting that the Delaware Insurance Commissioner put Arrowood into liquidation (1.2); correspondence with J. Bair and T. Burns re same (.2);	1.40	\$588.00
5/16/2023	Jesse Bair	Review correspondence with the Diocese and PSZJ re upcoming mediation session (.1);	0.10	\$62.50

5/16/2023	Jesse Bair	Answer L. Au questions re Arrowood litigation project (.1);	0.10	\$62.50
5/16/2023	Jesse Bair	Participate in conference with T. Burns and L. Au re Arrowood strategy and related assignments (.4);	0.40	\$250.00
5/16/2023	Leakhena Au	Begin drafting proposed complaint against Arrowood regarding Arrowood's unfair and deceptive claims practices (6.4);	6.40	\$2,688.00
5/16/2023	Jesse Bair	Participate in conference with T. Burns re insurance mediation strategy (.4);	0.40	\$250.00
5/16/2023	Jesse Bair	Attend Court hearing for insurance purposes re claim objection discovery issues (.9);	0.90	\$562.50
5/16/2023	Timothy Burns	Participate in conference with J. Bair re insurance mediation strategy (.4); participate in conference with J. Bair and L. Au re Arrowood strategy and related assignments (.4); review correspondence with the Diocese and PSZJ re upcoming mediation session (.2); begin preparing for next mediation session (.1); attend Court hearing for insurance purposes re claim objection discovery issues (.9);	2.00	\$1,950.00
5/17/2023	Leakhena Au	Draft email summary re cause of action against Arrowood re Arrowood's unfair and deceptive claims practices (1.1);	1.10	\$462.00
5/17/2023	Jesse Bair	Review the Diocese of Brooklyn's expert affidavit re Arrowood's financial condition (.3); correspondence with I. Nasatir re same (.1);	0.40	\$250.00
5/17/2023	Leakhena Au	Continue drafting proposed complaint against Arrowood regarding Arrowood's unfair and deceptive claims practices (4.6);	4.60	\$1,932.00
5/17/2023	Jesse Bair	Preliminary research re potential Arrowood claim (.1);	0.10	\$62.50
5/17/2023	Jesse Bair	Review the parties' joint status update letter to the Court in the Evanston district court action (.1);	0.10	\$62.50
5/18/2023	Timothy Burns	Travel to New York from Madison for mediation [billed at 1/2 travel rate] (5.2);	5.20	\$2,535.00
5/18/2023	Jesse Bair	Prepare for mediation session (.1); participate in day 1 of mediation (3.7); participate in post-mediation meeting with J. Stang and T. Burns re case insurance strategy (1.0);	4.80	\$3,000.00
5/18/2023	Jesse Bair	Travel to New York from Madison for mediation [billed at 1/2 travel rate] (4.6);	4.60	\$1,437.50
5/18/2023	Leakhena Au	Analysis re alternative strategies for bringing unfair claims practices cause of action against Arrowood (2.4);	2.40	\$1,008.00
5/18/2023	Timothy Burns	Participate in day 1 of mediation (3.7); participate in post-mediation meeting with J. Stang and J. Bair re case insurance strategy (1.0);	4.70	\$4,582.50

5/18/2023	Jesse Bair	Review the Diocese's and Arrowood's letter to Judge Rochon re upcoming discovery dispute hearing (.1);	0.10	\$62.50
5/19/2023	Timothy Burns	Participate in day 2 of mediation session (13.4);	13.40	\$13,065.00
5/19/2023	Jesse Bair	Participate in portion of day 2 of mediation session (11.8);	11.80	\$7,375.00
5/19/2023	Timothy Burns	Travel Rate for local travel to and from mediation [billed at 1/2 travel time] (1.0);	1.00	\$487.50
5/19/2023	Jesse Bair	Return travel from New York mediation to Madison [billed at 1/2 travel time] (3.1);	3.10	\$968.75
5/20/2023	Timothy Burns	Return travel from New York mediation to Madison [billed at 1/2 travel time] (8.6);	8.60	\$4,192.50
5/20/2023	Jesse Bair	Review correspondence with state court counsel re mediation strategy (.1);	0.10	\$62.50
5/21/2023	Jesse Bair	Correspondence with T. Burns re outcome of state court counsel meeting re potential mediation counter (.1);	0.10	\$62.50
5/21/2023	Jesse Bair	Prepare for state court counsel meeting (.1); participate in meeting with PSZJ and state court counsel for insurance purposes re mediation strategy and potential next counter (1.3);	1.40	\$875.00
5/21/2023	Timothy Burns	Correspondence with J. Bair re outcome of state court counsel meeting re mediation strategy (.1);	0.10	\$97.50
5/22/2023	Jesse Bair	Draft Section 3420 notice letter to the carriers (1.0); correspondence with T. Burns re same (.1);	1.10	\$687.50
5/22/2023	Jesse Bair	Draft letter to the Court re the Committee's participation at the upcoming Arrowood discovery hearing (.2);	0.20	\$125.00
5/22/2023	Jesse Bair	Participate in conference with T. Burns re the mediators' recent correspondence and potential response to same (.2);	0.20	\$125.00
5/22/2023	Karen Dempksi	Finalize and file with the Court letter re the Committee's participation at the upcoming Arrowood discovery hearing (.1);	0.10	\$36.00
5/22/2023	Jesse Bair	Analyze W. Chapin deposition transcript in preparation for Arrowood discovery hearing (2.1);	2.10	\$1,312.50
5/22/2023	Jesse Bair	Review correspondence from the mediators re potential next-steps (.1); review correspondence with J. Stang and state court counsel re same (.1);	0.20	\$125.00

5/22/2023	Timothy Burns	Review and consider correspondence from the mediators re potential next-steps(.2); participate in call with J. Bair re same (.2); prepare for state court counsel meeting re same (.4); participate in meeting with state court counsel and PSZJ for insurance purposes re mediation strategy and potential response to the mediators' recent correspondence (.7);	1.50	\$1,462.50
5/22/2023	Jesse Bair	Prepare for meeting with state court counsel and PSZJ re mediation strategy (.1); participate in meeting with state court counsel and PSZJ for insurance purposes re mediation strategy and potential response to the mediators' recent correspondence (.7);	0.80	\$500.00
5/23/2023	Jesse Bair	Participate in Committee meeting for insurance purposes re mediation strategy and response to the mediators (1.1);	1.10	\$687.50
5/23/2023	Jesse Bair	Review initial draft of Committee letter to the mediators (.1); review suggested edits to same from state court counsel (.1);	0.20	\$125.00
5/23/2023	Jesse Bair	Preliminary review of email memorandum from L. Au re cause of action against Arrowood re Arrowood's unfair and deceptive claims practices (.1);	0.10	\$62.50
5/23/2023	Jesse Bair	Participate in call with T. Burns re draft Section 3420 notice letter, the Committee's draft response letter to the mediators, and upcoming Committee call re mediation strategy (.2);	0.20	\$125.00
5/23/2023	Jesse Bair	Participate in conference with B. Cawley re additional research needed in connection with finalizing Section 3420 notice letters to the insurers (.2); answer follow-up questions from B. Cawley in connection with same (.1);	0.30	\$187.50
5/23/2023	Brian Cawley	Participate in conferences with J. Bair re Section 3420 notice letters project (.3); draft revised version of Section 3420 notice letters to each of the Diocese's carriers (3.2);	3.50	\$1,470.00
5/23/2023	Jesse Bair	Review, edit, and draft additional portions of proposed complaint against Arrowood regarding Arrowood's unfair and deceptive claims practices (5.1);	5.10	\$3,187.50
5/23/2023	Jesse Bair	Correspondence with I. Nasatir and J. Stang re draft Section 3420 notice letter to the insurers (.1);	0.10	\$62.50

5/23/2023	Timothy Burns	Participate in call with J. Bair re Committee response letter to the mediators and upcoming Committee call re mediation strategy (.2); participate in Committee meeting for insurance purposes re mediation strategy and response to the mediators (1.1); review correspondence from I. Nasatir re Section 3420 notice letter (.1); review correspondence from J. Stang re same (.1); review draft Committee response letter to mediators (.2); review and respond to correspondence with state court counsel re same (.2); review draft Section 3420 letter (.1); review correspondence from the mediator re mediation developments (.1);	2.10	\$2,047.50
5/23/2023	Jesse Bair	Review additional correspondence from the mediators re potential next-steps (.1);	0.10	\$62.50
5/24/2023	Jesse Bair	Review I. Nasatir correspondence re recent Diocese insurance activities (.1);	0.10	\$62.50
5/24/2023	Jesse Bair	Review and consider Order cancelling Arrowood discovery hearing and related orders designating Judge Cave as magistrate for all pre-trial purposes (.1); correspondence with PSZJ re same (.1);	0.20	\$125.00
5/24/2023	Timothy Burns	Review correspondence from PSZJ re mediation developments (.1); review correspondence from the mediators re same (.1); review final version of the Committee's response letter to mediators (.1);	0.30	\$292.50
5/24/2023	Jesse Bair	Review final version of Committee letter to the mediators and mediators' response to same (.1); review additional correspondence with J. Stang and state court counsel re same (.1);	0.20	\$125.00
5/25/2023	Jesse Bair	Review suggested edits received from J. Stang and I. Nasatir to draft Section 3420 notice letters (.1); review updated version of notice letters received from B. Cawley (.1); begin drafting revised version of insurer Section 3420 notice letters incorporating suggested edits (.3);	0.50	\$312.50
5/25/2023	Jesse Bair	Participate in portion of meeting with PSZJ team for insurance purposes re mediation and insurance strategy (.6);	0.60	\$375.00
5/25/2023	Timothy Burns	Participate in portion of meeting with PSZJ team for insurance purposes re mediation and insurance strategy (.5);	0.50	\$487.50
5/25/2023	Jesse Bair	Review Judge Cave's orders re discovery status update letters in the LMI and Evanston actions (.1);	0.10	\$62.50
5/26/2023	Jesse Bair	Participate in conference with T. Burns re insurance case strategy (.2);	0.20	\$125.00

5/26/2023	Timothy Burns	Participate in conference with J. Bair re insurance case strategy (.2); correspondence with state court counsel re Arrowood issues (.1); review correspondence with PSZJ re upcoming state court counsel meeting (.1); reviewed Order re Ninth Objection to Claims (.6); review motion to compel order (.1); review correspondence with PSZJ and the Committee re recent communications with the mediators and next-steps (.2); review correspondence from J. Bair re discovery developments in the insurance district court actions (.1); review correspondence from I. Nasatir re case insurance issues (.1); review PSZJ's next-steps memo (.2); review discovery order from Judge Cave (.1); review orders re assignment of magistrate for all pre-trial purposes in certain insurance district court actions (.2); participate in state court counsel meeting for insurance purposes re mediation and litigation strategy (.9); review and revise proposed unfair and deceptive claims practices complaint against Arrowood (.8); review the mediators' report to the court (.1);	3.80	\$3,705.00
5/26/2023	Jesse Bair	Continue revising and finalizing Section 3420 notice letters and transmit same to the carriers (1.5);	1.50	\$937.50
5/26/2023	Jesse Bair	Review the mediators' status report (.1);	0.10	\$62.50
5/26/2023	Jesse Bair	Review T. Burns' suggested edits to the proposed Arrowood unfair and deceptive claims practices complaint (.2); correspondence with PSZJ re same and related demand letter (.2);	0.40	\$250.00
5/26/2023	Jesse Bair	Review the Court's order sustaining in part the Diocese's ninth omnibus claims objection (.3);	0.30	\$187.50
5/26/2023	Jesse Bair	Participate in state court counsel meeting for insurance purposes re mediation and litigation strategy (.8);	0.80	\$500.00
5/27/2023	Jesse Bair	Provide instructions to L. Au re drafting demand letter re proposed unfair and deceptive claims practices complaint against Arrowood (.2);	0.20	\$125.00
5/27/2023	Jesse Bair	Review correspondence with J. Stang and T. Burns re potential edits to draft unfair and deceptive claims practices complaint against Arrowood (.1);	0.10	\$62.50
5/27/2023	Jesse Bair	Correspondence with G. Greenwood and J. Stang re draft demand letter re proposed Arrowood unfair and deceptive claims practices complaint (.1);	0.10	\$62.50

5/29/2023	Jesse Bair	Preliminary review re J. Stang's suggested edits to the proposed Arrowood unfair and deceptive claims practices complaint (.1);	0.10	\$62.50
5/29/2023	Jesse Bair	Review the Diocese's 12th omnibus claims objection regarding late-filed claims (.1);	0.10	\$62.50
5/29/2023	Jesse Bair	Review the Diocese's eleventh omnibus claims objection regarding BSA claims (.2);	0.20	\$125.00
5/29/2023	Jesse Bair	Analyze and respond to insurance question from B. Michael re insurance impact, if any, of prosecution of certain state court lawsuits disallowed under the Court's recent order re pre-1957 abuse (.3);	0.30	\$187.50
5/30/2023	Jesse Bair	Participate in portion of Committee meeting for insurance purposes re mediation and litigation strategy (.6);	0.60	\$375.00
5/30/2023	Jesse Bair	Review and edit First Amended Trust Allocation Protocol (.2);	0.20	\$125.00
5/30/2023	Jesse Bair	Review and respond to correspondence with the Diocese re potential amendment to the Committee Intervention Order re discovery access in the Arrowood district court action (.1); prepare draft correspondence to Arrowood re same and requesting discovery meet and confer (.4);	0.50	\$312.50
5/30/2023	Jesse Bair	Review and edit First Amended Trust Agreement (.2);	0.20	\$125.00
5/30/2023	Jesse Bair	Review and edit draft Committee memorandum re motion to dismiss issues, including drafting of insurance section of same (1.3); review correspondence with I. Nasatir re same (.1); participate in conference with T. Burns re same (.1);	1.50	\$937.50
5/30/2023	Jesse Bair	Participate in call with T. Burns re outcome of Purdue Pharma decision (.1);	0.10	\$62.50
5/30/2023	Timothy Burns	Participate in call with state court counsel re insurance strategy issues (.1); review Purdue Pharma decision (.8); conference with J. Bair re same (.1); preliminary analysis re potential Committee Second Amended Plan edits (.1); participate in conference with J. Bair re motion to dismiss memo (.1); correspondence with B. Michael re team strategy meeting (.1); participate in portion of Committee meeting for insurance purposes re mediation and litigation strategy (.6);	1.90	\$1,852.50
5/30/2023	Jesse Bair	Review and edit for insurance purposes the Second Amended Committee Plan (1.9); participate in conference with T. Burns re same (.1);	2.00	\$1,250.00

5/30/2023	Jesse Bair	Review correspondence with I. Nasatir and K. Dine re insurance impact, if any, of prosecution of certain state court lawsuits disallowed under the Court's recent order re pre-1957 abuse (.1);	0.10	\$62.50
5/30/2023	Leakhena Au	Draft demand letter re proposed unfair and deceptive claims practices complaint against Arrowood (2.3);	2.30	\$966.00
5/31/2023	Timothy Burns	Participate in conference with J. Bair re motion to dismiss memo (.1); review and revise motion to dismiss memo for insurance purposes (.8); participate in strategy call with PSZJ for insurance purposes re litigation, mediation, and Plan strategy (1.2); review correspondence with J. Stang, the Diocese, and Judge Cave re mediation (.2); review agenda for state court counsel meeting (.1); correspondence with state court counsel re Arrowood solvency issues (.1); review Evanston correspondence re joint discovery letter (.1); reviewed T. Law's letter to court re discovery and Lexington's suggested changes (.2); conference with J. Bair re proposed Arrowood complaint edits (.3); review J. Bair correspondence to Arrowood re adversary proceeding participation (.1); participate in portion of state court counsel meeting for insurance purposes re litigation, mediation, and Plan strategy (1.1);	4.30	\$4,192.50
5/31/2023	Jesse Bair	Edit and finalize discovery meet and confer correspondence to Arrowood (.1);	0.10	\$62.50
5/31/2023	Jesse Bair	Correspondence with B. Michael re agenda for upcoming team strategy call (.1); prepare for team strategy call with PSZJ (.1); participate in strategy call with PSZJ for insurance purposes re litigation, mediation, and Plan strategy (1.2); participate in follow-up conference with T. Burns re potential changes to proposed Arrowood unfair claims practices complaint in light of meeting (.3);	1.70	\$1,062.50
5/31/2023	Jesse Bair	Review correspondence with the Diocese and Judge Cave re continued mediation negotiations (.1);	0.10	\$62.50
5/31/2023	Jesse Bair	Participate in portion of state court counsel meeting for insurance purposes re litigation, mediation, and Plan strategy (1.1);	1.10	\$687.50
5/31/2023	Jesse Bair	Review draft joint status letter to the Court in the LMI/Lexington district court action (.1); review Lexington's suggested edits to same (.1);	0.20	\$125.00

5/31/2023	Jesse Bair	Participate in conference with T. Burns re motion to dismiss memo (.1); review T. Burns' suggested insurance edits to same (.1); finalize insurance-related sections of memo (.1);	0.30	\$187.50
5/31/2023	Jesse Bair	Review draft joint status letter to the court in the Evanston district court action (.1); review correspondence with the Diocese and Evanston re potential edits to same (.1);	0.20	\$125.00
Total Hours and Fees			247.80	\$151,579.75

EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
5/9/2023	Taxi, J. Bair (airport to hotel)	\$83.29
5/9/2023	Hotel, T. Burns (1 night)	\$644.21
5/9/2023	Travel meal, T. Burns	\$10.82
5/9/2023	United Airlines, T. Burns (May 9-10 ORD-LGA)	\$374.70
5/9/2023	Hotel, J. Bair (1 night)	\$485.46
5/9/2023	Travel meal, J. Bair	\$16.33
5/9/2023	Delta Airlines, J. Bair (MSN-LGA May 9-10)	\$269.70
5/9/2023	Delta Airlines WiFi, J. Bair	\$9.95
5/10/2023	Delta Airlines WiFi, J. Bair	\$15.95
5/10/2023	Travel meal, T. Burns	\$36.30
5/10/2023	Travel meal, J. Bair	\$20.73
5/10/2023	Airport parking, J. Bair	\$20.00
5/16/2023	Westlaw, legal charges to obtain exhibits from Delaware Court in Arrowood mandamus action	\$697.00
5/18/2023	Taxi, J. Bair (airport to hotel)	\$99.96
5/18/2023	Taxi, T. Burns (airport to hotel)	\$127.00
5/18/2023	United Airlines, T. Burns (MSN-EWR May 18-19)	\$927.80
5/18/2023	Delta Airlines, J. Bair (May 18-19 MSN-LGA)	\$1,037.10
5/18/2023	Delta WiFi Onboard, J. Bair	\$4.95
5/18/2023	United Inflight Wi-Fi, T. Burns	\$8.00
5/18/2023	Hotel, T. Burns (1 night)	\$670.31
5/18/2023	Hotel, J. Bair (1 night)	\$670.31
5/19/2023	Airport parking, J. Bair	\$20.00
5/19/2023	Hotel, T. Burns (1 additional night)	\$670.31
5/19/2023	Uber, J. Bair (mediation to airport)	\$125.96
5/20/2023	United Airlines Inflight Wi-Fi, T. Burns	\$8.00
5/20/2023	Travel meal, T. Burns	\$30.59
Total Expenses		\$7,084.73

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alyssa Turgeon	0.90	\$360.00	\$324.00
Brenda Horn-Edwards	0.80	\$360.00	\$288.00
Brian Cawley	17.20	\$420.00	\$7,224.00
Jesse Bair	19.50	\$312.50	\$6,093.75
Jesse Bair	79.60	\$625.00	\$49,750.00
Karen Dempski	0.10	\$360.00	\$36.00
Leakhena Au	29.40	\$420.00	\$12,348.00
Nathan Kuenzi	17.30	\$420.00	\$7,266.00
Timothy Burns	26.00	\$487.50	\$12,675.00
Timothy Burns	57.00	\$975.00	\$55,575.00

Total Due This Invoice: \$158,664.48